

**Milione, Shawn (USANYS) [Contractor]**

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**From:** Jepal, Vinay  
**Sent:** Monday, June 20, 2011 1:35 PM  
**To:** ofac\_feedback@do.treas.gov  
**Cc:** CBNA Sanctions  
**Subject:** Emailing: Stratus International Contracting - Final  
**Attachments:** Stratus International Contracting - Final.pdf

**Importance:** High  
**Sensitivity:** Confidential

Attn: OFAC Compliance @ US Treasury

We like to share the attached information with the OFAC.

While performing the Transaction Review on an alert generated by our Transaction Surveillance system, we noted that one of the party to the transaction may be an Iranian or an Iranian Origin.

Please review the attached letter and the documents. If you have any questions or require any additional details, please let us know.

Thanks & regards,  
Vinay Jepal

Commerzbank AG  
Sanctions Compliance Officer  
New York, NY 10281-1050

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website: <http://www.commerzbank.us>

Commerzbank Aktiengesellschaft, Frankfurt am Main Handelsregister/Commercial Register: Amtsgericht Frankfurt am Main, HRB 32000 Vorsitzender des Aufsichtsrates/Chairman of the Supervisory Board: Klaus-Peter Müller  
Vorstand/Board of Managing Directors: Martin Blessing (Vorsitzender/Chairman), Frank Annuscheit, Markus Beumer, Achim Kassow, Jochen Klösges, Michael Reuther, Stefan Schmittmann, Ulrich Sieber, Eric Strutz, Martin Zielke

The message is ready to be sent with the following file or link attachments:

Stratus International Contracting - Final

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.



Department of the Treasury  
Office of Foreign Assets Control  
1500 Pennsylvania Avenue NW  
Washington DC 20220

Vinay Jepal  
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Telephone (212) 266-7200  
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[vinay.jepal@commerzbank.com](mailto:vinay.jepal@commerzbank.com)

June 16, 2011

**Re: Information Sharing – Stratus International Contracting Company**

Dear Sir/Madam:

Commerzbank AG, New York Branch (CBNY) would like to share the following information with OFAC. On April 20, 2011 CBNY's AML transaction monitoring system generated an alert, which involved a transaction for USD 29,442,967.57 value April 4, 2011.

The transaction was originated by Banco Del Tesoro, CA Banco Universal Caracas for its client BT / Fideicomiso / Fondo Chino Venezolano in Caracas, Venezuela. The beneficiary of the payment was Stratus International Contracting Company ("Stratus"), a client of Hyposwiss Privatbank AG, Zurich.

As per standard procedure, CBNY initiated a request for information to the remitting bank Banco Del Tesoro, CA Banco Universal Caracas, Venezuela to obtain details on both entities and their relationship. In the interim, CBNY conducted further due diligence and noted the following regarding Stratus from its website:

- Stratus was founded in 1978 in Tehran, Iran
- Stratus International specializes in providing contracting services to infrastructure projects such as roads, railways, dams, tunnels, airports and buildings.
- Stratus is presently working on a 7000 Apartment Unit "New Ojeda" Housing Development Project in Venezuela

On May 12, 2011, CBNY received a response from the bank in Caracas indicating the following:

- Stratus's physical address is Gardenya Plaza 5, K:3 D:3 (Floor 3, Suite3) 34758 Atasehir, Istanbul, Turkey
- Stratus is registered in Istanbul, Turkey (copy of the registration attached)
- Stratus provides construction services in Turkey, Dubai and Venezuela
- The purpose of the payment is for the construction of a 7000 apartment unit project "Proyecto Urbanismo Nueva Ciudad Fabricio Ojeda, in Cuidad Ojeda, Estado Zuila, Venezuela (same address as listed on Stratus' website)

Although Stratus is not listed as an SDN, and the payment does not indicate any direct involvement of Iran or with Iran, due to conflicting information between the website and the response forwarded by the bank in Caracas, CBNY believes it appropriate to share this information with OFAC since Stratus may be an Iranian Company.

Chairman of the Supervisory Board: Klaus-Peter Müller  
Board of Managing Directors: Martin Blessing (Chairman),  
Frank Annuscheit, Markus Beumer, Achim Kassow, Jochen Klösges,  
Michael Reuther, Stefan Schmittmann, Ulrich Sieber, Eric Strutz, Martin Zielke

Commerzbank Aktiengesellschaft, Frankfurt am Main  
Registered Office: Frankfurt am Main Reg.No. 32000  
VAT No. DE 114 103 514



**Re: Information Sharing – Stratus International Contracting Company– Page 2**

We have added Stratus into our sanctions filter to monitor any future payments. Please note that apart from this transaction, there have not been any other payments involving Stratus processed by CBNY to date.

The purpose of this letter is to report the good faith efforts of Commerzbank AG, New York Branch in complying with applicable OFAC requirements and voluntarily informing OFAC of any information received during its investigation into possible sanctions-related entities.

Should you have any further questions concerning this matter, please do not hesitate to contact the signatories below.

Respectfully,

Commerzbank AG  
New York Branch

A handwritten signature in green ink, appearing to read "Deepa Keswani".

Deepa Keswani  
Head of AML/Anti-Fraud/Sanctions Compliance

A handwritten signature in blue ink, appearing to read "Vinay Jepal". Above the signature is a handwritten date "4-20-08".

Vinay Jepal  
Sanctions Compliance Officer

Encls.

## stratus intl payment

: LT Address : COBAUS3XA  
 : transaction type : 202 COVER bank tfr favour 3rd bank  
 : input from : COBADEFF  
     COMMERZBANK AG FRANKFURT  
     HEAD OFFICE  
     32-36 NEUE MAINZERSTRASSE  
     60261 FRANKFURT GERMANY  
 : Validation Flag : COV}

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{4: Text block:  
 : 20 /transaction reference number : FAAS109400150500  
 : 21 /related reference : FAAS109400150500  
 : 32A/value date : 040411 USD 29,442,967.57  
 : 52A/ordering institution - BIC : COBADEFF  
     COMMERZBANK AG  
     FRANKFURT AM MAIN

: 57A/account with inst - BIC : CHASUS33  
     JPMORGAN CHASE BANK, N.A.  
     NEW YORK, NY

: 58A/beneficiary inst - BIC : SHHBCHZZ  
     HYPOSWISS PRIVATBANK AG, ZURICH  
     ZURICH

: 50K/ordering customer : /400887746602USD  
     BT/ FIDEI COMISO / FONDO CHINO  
     VENEZOLANO. AV GUI CAPI PURO. URB EL  
     ROSAL. TORRE BANCO DEL TESORO.  
     CARACAS - VENEZUELA.

: 52A/ordering institution - BIC : BDTEVECA  
     BANCO DEL TESORO, C.A. BANCO  
     UNIVERSAL  
     CARACAS

: 59 /beneficiary customer : /CH7708530519663100203  
     STRATUS INTERNATIONAL CONTRACTING  
     J. S.

: 70 /details of payment : REF: DESEMBOLSO NRO. 386 FONDO  
     CHINO VENEZOLANO. CODIGO NRO.  
     00579.

: 33B/amount : USD 29,442,967.57}

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Entry : /SWIFT/ Date: 110404 Time: 02:44:17  
 Info: 1111/001781



**Stratus International**  
Contracting Company

فارسي | [Staff Login](#) | [Site Map](#) | [Home](#)

STRATUS International Contracting Company has been founded in 1978 in Tehran, Iran, with registered paid up share capital of Rls 100 billions. STRATUS provides contracting services to infrastructure projects such as Roads, Railways, Dams, Tunnels, Airports and Buildings. Since 1994, STRATUS has been the first pioneer company in exporting Engineering and Technical Services in Iran and received "Exemplary Exporters" of the year 1999 from his excellency Mr. president.



- ➡ STRATUS is an Engineering, Construction, Management and Contracting Company by specializing in the field of Building Construction, Road Works and Water Works.  
STRATUS is Graded in three major categories: [Read more...](#)
  
- ➡ STRATUS has succeeded to receive ISO 9001-2000 certificate for Quality Management System from MIC registered under UKAS, United Kingdom from 2004 which upgraded recently to ISO 9001-2008 in 2010 and intending to extend it by OHSAS 18001:2007. [Read more...](#)

- ➡ Our memberships:
  - Federation of Contractors of Islamic Countries (F.C.I.C.)
  - Pakistan Engineering Council
  - International Chamber of Commerce (I.C.C.)
  - Iran – UK Chamber of Commerce
  - Iran – Canada Chamber of Commerce [Read more...](#)

#### *Road & Railway*



#### *Dam*



#### *Building*





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### Contact Us

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STRATUS International Contracting Co.

Address: **No.35, Golestan St., Iran Zamin Ave., Shahrake Ghods, Tehran, Iran.**

Postal Code: **1465865187**

Tell: **(98) 21 8837 3100-6**

Fax: **(98) 21 8808 2882**

E-mail: **[stratus@stratusgc.com](mailto:stratus@stratusgc.com)**

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#### Branch Offices

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##### Middle East

Iran  
Iraq

##### CIS

Kazakhstan

##### South America

Venezuela

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#### Sister Companies List



1. Samaneh Stratus (INVESTMENT CO.)



2. Iran Construction Investment Co.



3. Eghtesad - Novin Bank

4. Pishgaman Bazar Novin (BROKERAGE CO.)



5. Novin Insurance Co.



6. Pars Shahr Co.



7. Global Petro Tech CO.



8. Keyhan Tabadol Co.



9. Pars Hanza Aluminium CO.



10. Azarbajian Industry Development Co.

11. Eghtesad Novin Investment CO.



12. Samaneh Gostar Novin

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## 7000 Units 'New Ojeda' Housing Development Project

Main Technical Features	Site Gross Area : 318 Hec. Concrete works : 520,000 m <sup>3</sup> Net Construction Area : 850.000 m <sup>2</sup> Water & Sewage network : 150 Km Electrical network : 200 Km Communication network : 220 Km Gas network : 30 Km
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Location	Ciudad Ojeda, Zulia State, Venezuela
Employer	Ducolsa 'Urban Development S.A'
Contract Duration	48 Months
Date of Award	September 2009
Status	[ Under Construction ]



[\[Back to list\]](#)



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Dalbandin – Nokkundi Highway - Section III-B

[Details >>](#)



Socotra Airport

[Details >>](#)



Design & Construction of Parliament Building & Commercial Center in Djibouti City

[Details >>](#)



7000 Units "New Ojeda" Housing Development Project

[Details >>](#)

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T.C.  
İSTANBUL  
Ticaret Sicil Memurluğu

## SİCİL TASDİK NAMESİ

Ticaret Ünvanı	STRATUS INTERNATIONAL CONTRACTING İNŞAAT VE TAAHHÜT ANONİM ŞİRKETİ
Sicil No.	751671
Tescil Tarihi	22 / 10 / 2010
İşletme Merkezinin Adresi (Şubenin tescilinde şubenin Adresi ile beraber merkezin adresi de yazılır.)	GARDENYA PLAZA 5 K.3 D.3 ATAŞEHİR
İşletmenin uğraştığı işler	Ana sözleşmesinde yazılı olan işler
İşletme sahibinin hüviyeti (Hükmi şahıslarda, hükümlü şahsın mahiyeti)	Anonim
İşletme temsilcileri	38824643592 TC.No.1u CELAL TATLICİBAŞI
Tasdiknamenin düzenlenme Tarih ve Sayısı	22 EKİM 2010 - 39185

RECAİ SÖKME  
İSTANBUL TİCARET SİCİLİ  
MEMURU YARDIMCISI

